



faegredrinker.com

Frank F. Velocci
Partner
frank.velocci@faegredrinker.com
973-549-7078 direct

Faegre Drinker Biddle & Reath LLP
600 Campus Drive
Florham Park, New Jersey 07932
+1 973 549 7000 main
+1 973 360 9831 fax

March 30, 2020

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re: *Nivagen Pharmaceuticals, Inc. v. Flamingo Pharmaceuticals, Ltd.*
17-cv-7854 (GBD)**

Dear Judge Wang:

This firm is counsel to Defendant Flamingo Pharmaceuticals, Ltd. ("Flamingo"). We write with the consent and approval of counsel for Plaintiff Nivagen Pharmaceuticals, Inc. ("Nivagen") to submit a revised Civil Case Management Plan and Scheduling Order to the Court pursuant to the Court's Orders of March 23, 2020 [ECF 67] and March 26, 2020 [ECF 69]. This letter shall also serve as the Parties' joint update on the status of discovery, as required by this Court's February 20, 2020 order [ECF 64].

Pursuant to the Court's March 23 Order, all unexpired discovery deadlines have been extended for a period of sixty (60) days. The revised Civil Case Management Plan and Scheduling Order submitted herewith reflects the new fact discovery end date of June 29, 2020. All other discovery deadlines have been extended by a corresponding period. The parties believe the revised schedule is appropriate and should allow sufficient time to complete the outstanding fact discovery, which primarily consists of depositions. As directed, for in-person depositions scheduled after May 1, 2020, the parties shall submit a joint status letter to the Court containing the deposition plan(s) at least fourteen (14) days prior to the deposition(s).

We appreciate the Court's attention to this matter.

Respectfully submitted,

/s *Frank F. Velocci*

Frank F. Velocci

cc: All Counsel of Record (via ECF)